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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

03 APR -8 PM 12:06

UNITED STATES OF AMERICA,

Plaintiff,

v.

LELAND DAVID HASKINS, JR.

Defendant.

03 - CR 074

Case No. 03-CR- (WCG)
GREEN BAY
[T. 29 U.S.C. §§ 501(c) and 439(c)]

INDICTMENT

THE GRAND JURY CHARGES:

Allegations Common to all Counts

1. From about August 2000 to on or about March 2002, Leland David Haskins, Jr. was Secretary-Treasurer of Division 173 of the Brotherhood of Locomotive Engineers (hereinafter BLE 173), Fond du Lac, Wisconsin.
2. Division 173 of the Brotherhood of Locomotive Engineers was a labor organization within the meaning of the Labor-Management Reporting and Disclosure Act, and engaged in an industry affecting commerce.
3. During that time period, Leland David Haskins, Jr. embezzled approximately \$41,600.12 of union funds and diverted said funds to his own use.

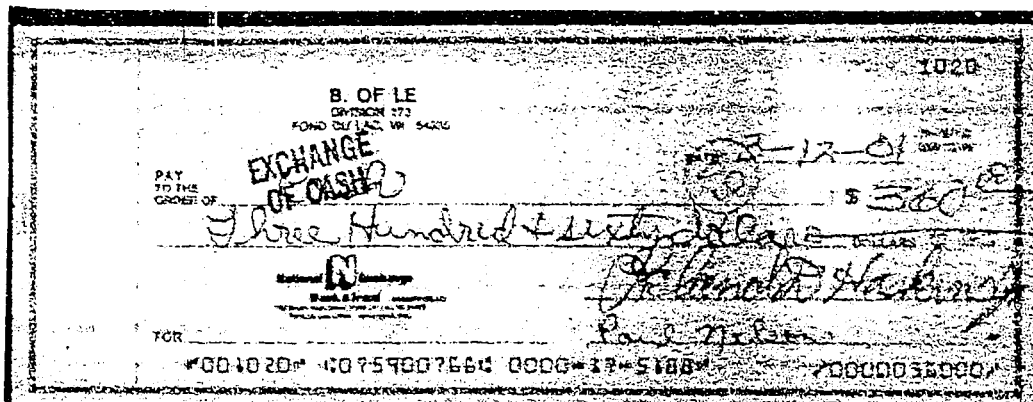
COUNT ONE

THE GRAND JURY FURTHER CHARGES:

4. On or about March 12, 2001, in the State and Eastern District of Wisconsin,

LELAND DAVID HASKINS JR.,

the defendant herein, did knowingly and willfully make false entries in records of BLE 173 by forging the signature of the BLE 173 alternate Secretary/Treasurer on a union check number 1020 for \$360.00. The check is reproduced below.



All in violation of Title 29, United States Code, Section 439(c).

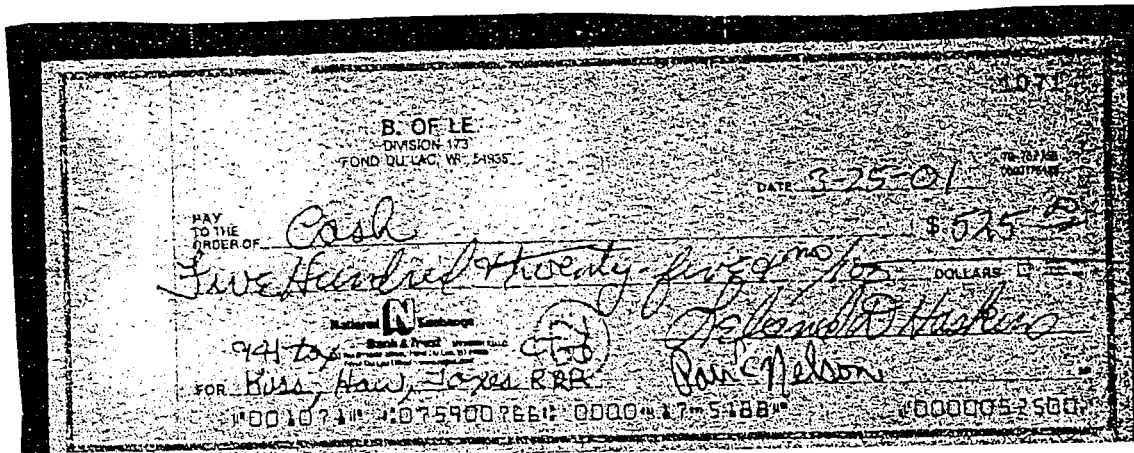
COUNT TWO

THE GRAND JURY FURTHER CHARGES:

5. On or about August 25, 2001, in the State and Eastern District of Wisconsin,

LELAND DAVID HASKINS JR.,

the defendant herein, did knowingly and willfully make false entries in records of BLE 173 by forging the signature of the BLE 173 alternate Secretary/Treasurer on union check number 1071 for \$525.00. The check is reproduced below.



All in violation of Title 29, United States Code, Section 439(c).

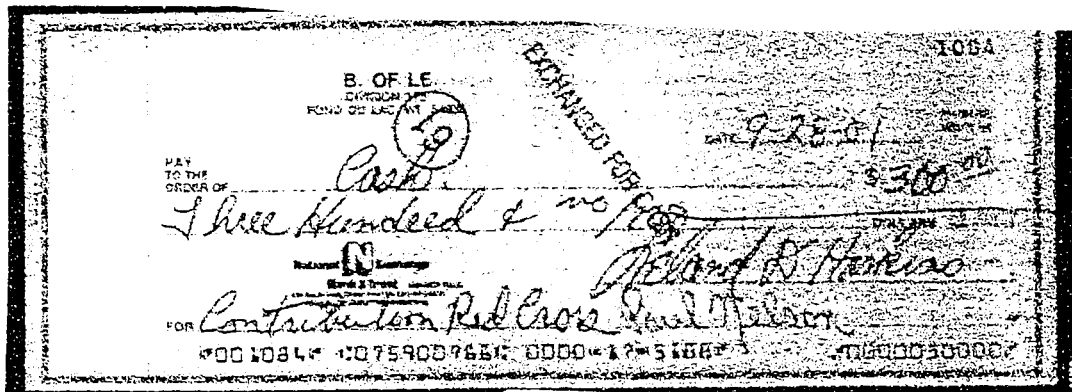
COUNT THREE

THE GRAND JURY FURTHER CHARGES:

6. On or about September 28, 2001, in the State and Eastern District of Wisconsin,

LELAND DAVID HASKINS JR.,

the defendant herein, did knowingly embezzle \$300.00 from BLE 173 by cashing check number 1084 drawn on BLE 173's checking account number 0000-17-5188 held at National Exchange Bank. The defendant falsely indicated on the check, in the memo section, that the check was to be used for a donation from the union to the Red Cross for the victims of September 11th when, in fact he used the money for his own benefit. The defendant knew that BLE 173 approved a donation to the Red Cross for the victims of September 11 but no contribution was ever received by the Red Cross. The check is reproduced below.



All in violation of Title 29, United States Code, Section 501(c).

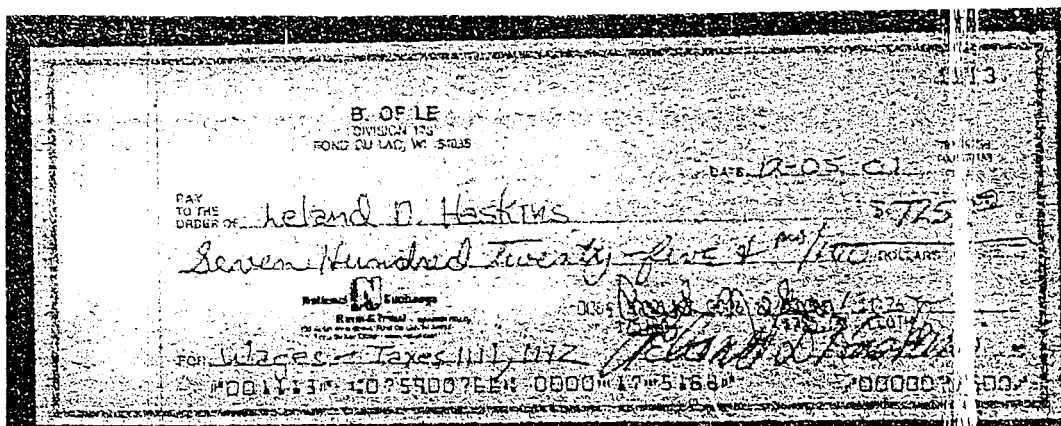
COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

7. On or about December 5, 2001, in the State and Eastern District of Wisconsin,

LELAND DAVID HASKINS JR.,

the defendant herein, did knowingly embezzle \$725.00 from BLE 173 by cashing check number 1113 draw on BLE 173's checking account number 0000-17-5188 held at National Exchange Bank. The defendant falsely indicated on the check, in the memo section, that the check was to be used to pay wages and for federal employment taxes to the Internal Revenue Service when, in fact, he used the money for his own benefit. The check is reproduced below.

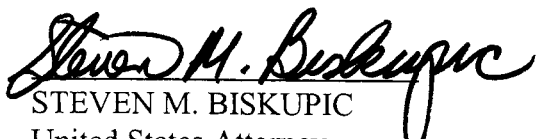


All in violation of Title 29, United States Code, Section 501(c).

A TRUE BILL:


FOREPERSON

Dated: 4/8/03


STEVEN M. BISKUPIC
United States Attorney